

**GIA MARIE BRADLEY**

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February 13, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

RE: FOIA REQUEST

Subject of Request: **Dube Auto Group, Inc.**, which operates "Bill Dube Hyundai" at 271 Main Street, Wilmington, MA 01887

To Whom It May Concern:

Pursuant to the Freedom of Information Act, 5 U.S.C. 552, as amended, I hereby request various information and data pertaining to EPA inspection activities where analytical and/or other measurements of particular substances that may have been made and reported and/or where inspections of the following business premises have occurred:

**Dube Auto Group, Inc.:** A foreign profit corporation organized under the laws of New Hampshire in 2004 & registered in MA on February 7, 2005.

**Principal Office:** 40 Dover Point Road, Dover, Strafford County, New Hampshire, 03820.

**President and Treasurer:** C. Scott Dube - 271 Main Street, Wilmington, Middlesex County, MA 01887.

**Accident Location:** "Bill Dube Hyundai" - 271 Main Street, Wilmington, Middlesex County, MA 01887.

**Accident Date:** July 21, 2015

I have prepared this request in my capacity as the attorney for a man who was severely injured while working as an Auto Detailer at the **Bill Dube Hyundai Auto Dealership located at 271 Main Street in Wilmington, Massachusetts.**

On July 21, 2015, my client slipped and fell on grease and oil located on the ground in a garage bay of the Bill Dube Hyundai dealership while he was detailing cars. My client commenced litigation against the Dube Auto Group, Inc., asserting that the dealership in question did not have a proper effluent discharge system in place for the separation and safe removal of water, oil, grease and chemicals that were released to the ground and into the Town of Wilmington's storm drain and sanitary sewer system during the car detailing process. The cleaning agents used during the car detailing process were not biodegradable or environmentally friendly and the Dube Hyundai dealership did not have the equipment necessary (i.e., a water reclamation system), to collect and clean the runoff wastewater after the car cleaning process, and which created a hazardous work environment.

In light of the above-described accident, which is the subject of a complaint on file with the Middlesex Superior Court, Santaniello V. Dube Auto Group, Inc., Docket No.: 1781CV-03657, request is made for copies of the following documents:

1. Copies of all investigative reports prepared as a result of any inspections conducted by the EPA, following my client's accident at Bill Dube Hyundai in Wilmington MA during the following period: from the date of my client's accident, on **July 21, 2015, up to the present date**;
2. All reports and documents containing information and data pertaining to EPA inspection activities where analytical, sampling and/or other measurements of any particular substances and chemicals may have been found, reported and tested by the EPA, following any inspections of the Bill Dube Hyundai in Wilmington during the period **July 21, 2015 to the present date**;
3. Copies of all complaints or notices of fines, if any, issued by the EPA to the Dube Auto Group, Inc., during the period **July 21, 2015 to the present date**, as a result of its operation of an auto detailing business at the Bill Dube Hyundai in Wilmington, MA;
4. Copies of all documents and reports, prepared by, or on file with, the EPA concerning any follow-up inspections that may have been conducted of the Bill Dube Hyundai in Wilmington MA from **July 22, 2015 to the present** to confirm whether any hazardous conditions/violations had been abated at said business;
5. Copies of all documents and reports prepared by, or on file with, the EPA containing any referrals of the above-identified business to any other Federal agencies, (i.e., OSHA), or to any local or state agencies, such as the MA State Police, Town of Wilmington, or applicable Fire Department(s), concerning the period **July 21, 2015 to the present**.

I reiterate the above 5 requests, however, the time period applicable to this second set of requests applies to the following 5-year period that predates my client's accident - **January 1, 2010 to July 20, 2015**.

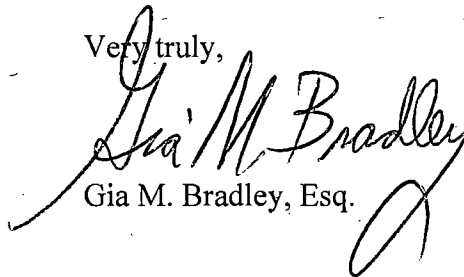
These requests include all documents that have ever been within your custody or control, whether they exist in agency "working," investigative, retired, electronic mail, or other files currently or at any other time.

For any documents or portions of documents for which you assert specific exemption(s) from the requirements of the Freedom of Information Act, please provide an index itemizing and describing the documents or portions of documents withheld. The index should, pursuant to the holding of Vaughn v. Rosen (484 F.2d 820 [D.C. Cir. 1973] cert. denied, 415 U.S. 977 [1974]), provide a detailed justification for claiming a particular exemption that explains why each such exemption applies to the document or portion of a document withheld.

I look forward to receiving your response within the twenty-day statutory time period. If you have any questions or need additional written information, please do not hesitate to contact me.

Thank you for your consideration in this matter.

Very truly,

A handwritten signature in cursive script, reading "Gia M. Bradley". The signature is written in dark ink and is positioned above the printed name "Gia M. Bradley, Esq.". The signature is fluid and stylized, with the first letters of each name being capitalized and prominent. The overall shape of the signature is elongated and flows from left to right.

Gia M. Bradley, Esq.